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Department of Health and Human Services
Substance Abuse and Mental Health Services Administration
5600 Fishers Lane, Rockwall II
Suite 815
Rockville, Maryland 20857

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Proposed Revisions to Mandatory Guidelines for Federal Workplace Drug Testing Programs

Dear Sirs and/or Madams,

I am a concerned citizen writing to protest the proposed rule change that will allow additional methods of Federal Workplace Drug Testing to include hair, saliva and sweat testing. Not only are these added tests unnecessary, they will filter down to the rest of society and increase costs that will be forced onto employers and eventually consumers. These new tests will also create another avenue for drug testing errors that will negatively affect millions of working citizens.

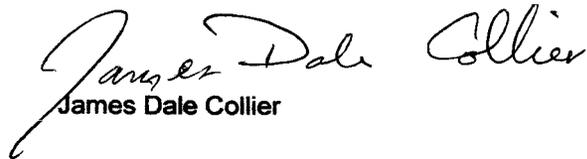
So few Federal employees fail drug tests now that there is no legitimate basis for mandating new forms of testing. If you are truly concerned about public safety, the common urine testing should be abolished in favor of testing for impairment. The problem with all current and the new proposed tests are that they test for some obscure drug metabolites that have no bearing on a person's intoxication. There are countless prescription drugs and over the counter medicines that cause as much if not more impairment than illegal drugs. Emotional problems and lack of sleep can also be just as impairing as drug use. Limited testing for just a few illegal drugs is a totally inadequate and misleading crusade against morality and does not really protect the public from the real dangers of people that are too impaired to function on the job. Alcohol testing may be the sole exception because that test at least does indeed measure some level of impairment. There are new hand/eye coordination tests that are much more effective in measuring impairment. Those tests should be the model for employee testing if your mission of protecting the public is indeed as stated. The failed science of testing bodily fluids and hair is just barbaric in this day and age. The drug using public can always find a way to subvert any chemical test while the sober employee's job is put into jeopardy by each potentially fallible test. Nothing ever made by man is totally infallible. Testing for impairment is the only safe guarantee of a sober employee.

Your new proposed tests are expensive and controversial. All forms of drug testing already violate individual Constitutional Rights and these new tests are one more invasion of personal liberties and privacy. The drug testing industry has grown into a multi-million dollar business intent on expanding their reach based on pure profit motives. This financial burden has been forced onto the American taxpayer and the general consumer as costs invariably get passed on through higher taxes and the costs of goods sold.

Ever increasing drug testing and personnel monitoring has resulted in a climate of fear and persecution bordering on a Police State in this Nation. I passed multiple drug tests over the years but, even though I do not use drugs, I am still in fear that a mistake will ruin my career one day. There is no way to fight an erroneous drug test. It is a case of, "Guilty until proven innocent". This is not the philosophy of our forefathers or the multitude of citizens that gave their lives in support of the freedoms mandated by our Constitution and our Democracy.

These changes are once again leading us down a dangerous path of big government bent on eroding civil liberties and big business driven by profits; both inflicting harm on the masses through well-intentioned but, inherently flawed laws. At least let the public vote on this issue.

Sincerely,

A handwritten signature in cursive script that reads "James Dale Collier". The signature is written in black ink and is positioned above the printed name.

James Dale Collier